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April 19, 2024

**VIA ECF**

Hon. Vera M. Scanlon, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Anderson v. Kang Long U.S.A. Corporation**  
**Case No. 24-cv-1774 (RER) (VMS)**

Dear Magistrate Judge Scanlon:

We just were retained today to represent defendant Kang Long U.S.A. Corporation, in the above-referenced ADA website accessibility matter. Upon review of the docket, we see that our client's response to the lawsuit was due by April 18, 2024.. With the gracious consent of plaintiff's counsel, we respectfully request a *nunc pro tunc* extension of time until May 10, 2024, to respond to the Complaint. This is defendant's first such request, and no other dates will be affected if our request is granted.

We thank the Court for its attention to this matter and are available at Your Honor's convenience should the Court have any questions regarding the foregoing.

Respectfully submitted,

David Stein

cc: Mars Khaimov, Esq. (via ECF)